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October 26, 2010

VIA ECF

Magistrate Judge Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lujan v. Cabana Management, Inc.
Case No. 10-cv-0755

Dear Magistrate Judge Mann:

We are writing regarding your Order pertaining to Defendants' request for a one week extension to submit their opposition to Plaintiff's motion for conditional certification. We apologize for not identifying the reason for the request. Good cause exists for the request. Individually named Defendant Glenn Frechter's mother was admitted to the hospital in late September and was in the hospital for three weeks for bypass surgery and valve replacement surgery. As a result, his ability to assist in the defense of the case has been restricted. His mother has been discharged from the hospital, but has had complications. Plaintiff also submitted eleven affidavits from former employees in support of the motion, many of who have not been employed for over three years. Additional time is needed investigate their claims and pull relevant records regarding their employment. I also have some unexpected personal issues relating to my father, who was recently admitted to a long-term care nursing home, and need to attend a care meeting with the medical staff Thursday, making submission by Friday difficult. Accordingly, we respectfully request the Court grant Defendants' request for a short one week extension. As noted, Plaintiff's counsel consented to the request.

Respectfully yours,

JACKSON LEWIS LLP

Jeffrey W. Brecher

JWB/mf

cc: Lloyd Ambinder, Esq.